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**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Matthew Cromly, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that is stored at premises owned, maintained, controlled, or operated by “Kik c/o MediaLab.AI Inc.”, an online chat platform that enables users to chat directly or in groups using text or chatbots, headquartered at 1237 7th St., Santa Monica, CA 90401. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require “Kik c/o MediaLab.AI Inc.”, to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the accounts, including the contents of communications.

2. I am a Special Agent with FBI Cleveland’s Toledo resident Agency. I have been a Special Agent of the FBI since 2002 and am currently assigned to FBI Cleveland’s Northwest Ohio Violent Crimes Against Children Task Force. I have received training and have experience in executing search warrants for electronic communications and data, as well as reviewing the seized evidence in support of a criminal prosecution.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

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4. I am investigating MARTIN LEE WILCOXON (hereinafter WILCOXON), who has been charged with violating 18 U.S.C. § 2422(b), Coercion or Enticement, as well as 18 U.S.C. § 2251(a), Sexual Exploitation of Minors. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that fruits, evidence, and instrumentalities, described in Attachment B, of the crime are located within the account(s), as described in Attachment A.

JURISDICTION

5. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A), & (c)(1)(A). Specifically, the U.S. District Court of the Northern District of Ohio is “a district court of the United States . . . that has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

IDENTIFICATION OF THE ACCOUNT TO BE EXAMINED

6. The Kik account(s) to be examined is “workitgood08_ies@talk.Kik.com”, and any and all other accounts which “Kik c/o MediaLab.AI Inc.” knows are subscribed to by Martin Lee WILCOXON.

PROBABLE CAUSE

7. On June 10, 2022, FBI Cincinnati informed FBI Cleveland of an individual in Northwest Ohio who was in contact with the FBI Cincinnati Subject. The two were interacting via a social media application called Kik. Your affiant is aware that Kik is a freeware modern social media application, available for free on iOS and Android operating systems. It uses a smart phone’s data plan or Wi-Fi to transmit and receive messages, photos, and/or videos. Kik has full user profiles, voice and video messaging, pictures, and gifs. Based on my training and

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experience, Affiant is aware that Kik is known to be used by child pornographers to receive and/or distribute child pornography.

8. During April 2022, the FBI Cincinnati Subject was a member of two Kik chat groups which also included a user with a Kik screenname of “workitgood08”. On 04/13/2022, a member in one of the Kik groups posted an image of a female in underwear. Kik user “workitgood08” typed **“Great....another girl with clothes on”**, followed by **“Just saying more nudity would be nice lol. This dressed shit I can see on the internet in magazines anytime lol 😊”**. Also on 04/13/2022, in a second group chat, in response to the FBI Cincinnati subject discussing his alleged 5 and 8 year old step-daughters, “workitgood08” asked **“Got the 8 nude?”**. In regard to other group members discussing a 7-year-old, “workitgood08” replied **“Seen a vid of a girl that age actually taking a huge cock like a champ. Bulge in her stomach and the sound of each thrust were very clear.”**, **“Mhm. Hot as hell. Guy was definitely above average size and she took it all. You could literally hear the squish of each thrust and see the huge bulge pushing into her guts because it pressed her stomach skin out around it as he pushed back and forth inside her.”**, and **“And she took the loads too every time.”** When other group members asked if “workitgood08” still had the video and masturbated to it, “workitgood08” replied **“I did several times. And maybe....but not right on hand.”**

9. Subsequent investigation concluded that “workitgood08” is the Kik screenname utilized by MARTIN LEE WILCOXON (hereinafter “WILCOXON”), date of birth April 11, 1991.

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10. FBI Cincinnati learned that FBI El Paso had an Online Covert Employee (hereinafter “OCE”) portraying the persona of a 13-year-old girl also on Kik. The OCE has been engaged in conversation with an individual with the Kik username “workitgood08” user since approximately February 2022.

11. Your affiant reviewed the chats between OCE and “workitgood08” (WILCOXON). During their chats, “workitgood08” (WILCOXON), requests the age, sex and location of the OCE. The OCE responds **“13f TX,u?”** “workitgood08” (WILCOXON) responds **“Nice. You care about age hun or are you cool with a lot older men?”** The OCE asks how much older and “workitgood08” (WILCOXON) responds **“30 M”**. “workitgood08” (WILCOXON) then tells the OCE he is from Ohio.

12. After engaging in conversation on Kik, the OCE and “workitgood08” (WILCOXON) then go to the social media application, Snapchat. Your affiant is aware that Snapchat is a free social media application in which users can send and receive photos. The photos delete after one to ten seconds. While utilizing Snapchat, WILCOXON sends at least two photos of himself to the OCE.

13. On June 14, 2022, your affiant reviewed the current Driver License/BMV photo of WILCOXON and compared this image to what was sent by “workitgood08” via Snapchat to the OCE. Your affiant believes it to be the same individual, MARTIN WILCOXON.

14. Your affiant further reviewed the chats between the OCE and “workitgood08” (WILCOXON). During several of the chats, “workitgood08” (WILCOXON) states he wants to travel to meet with the OCE to engage in sexual acts. They have discussed setting up a meeting multiple time. Below is an example:

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On 4/28/2022 12:06:24 p.m. (UTC-6) and following:

Workitgood08: Perhaps you can get your parents to actually do a vacation up and around Tennessee later in June.

OCE: lol I'll see what r summer plans r

Workitgood08: I'll have to double-check exactly where....but I had a vacation deal thing I picked up a while ago that I had to set for around then. Right at the end of June.

OCE: In Tennessee?

Workitgood08: Yea, if u remember right.

Workitgood08: *If I

OCE: ok well let me know

Workitgood08: Think you can convince them to do some vacation?

OCE: I'll try

Workitgood08: Think they'll wonder if you randomly disappear at the place?

OCE: Not sure we'd have to come up with a good plan

Workitgood08: any chance you could get them to bring you and Layla both since you're friends? Could get you another room with you and her that way. Easier to sneak out of of course if you can or even if alone, I could just happen to run into you with them around and "recognize" you from a school event there. For all they know, I'm your other friend's cousin or something that was introduced to you at some sports thing or something you went to

OCE: Layla is always allowed to come with us. Shes like family. I toled them I wanted to go to Knoxville or Nashville for vacay

workitgood08: Perfect on the first part. And I tracked down the email. It's over near the Dollywood place southeast of Knoxville just a little ways. It's a shame I don't have my other car fixed up though. All I'd have to do is dress nicer and they'd assume I'm a cop or something just from the clothes and the car

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15. Your affiant reviewed chats most recently in June, in which WILCOXON again expresses his desire to meet with the OCE to have sex with her. Below is an example:

On 6/4/2022 7:22:33 PM(UTC-6)

workitgood08: Hun.....tell me.....where can you get to for any trip that's towards this way if possible? And are you sure you can get away from your parents and such long enough to have time to enjoy everything together?

I do want you to be able to enjoy what we do. Not have to rush it too much your first time.

OCE: I can probably get away for a few hours at least.

workitgood08: Like I really want you to be able to feel the slow firm sliding of it inside you with the warmth and feel my heartbeat pulsing through my cock and everything with each thrust to make you feel amazing 😊

OCE: I can go back to Chicago

workitgood08: I could try to figure Chicago. Might just have to see about a run there with the work truck and take a day or so.

Are we decided that we are using condoms in your pussy though just to be careful for now at least? Or do you absolutely want it in there without one?

OCE: Or Detroit maybe 🧑🏻👤

workitgood08: I mean til later in the future, not forever with them. And wait.....you could get to Detroit?

**OCE: Yeah I think so.....how far is that from u
I have a cousin there**

workitgood08:Like 2-3hrs.....at best.

OCE: That's not too bad at all

workitgood08:That's actually a lot better than Chicago would be honestly.

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**OCE: Chicago would be the easiest but I could ask to go to Detroit
What big city is closest to u**

**workitgood08: If it means us actually getting time together, the Detroit one would
definitely be closest of the 2.
Unless you could manage Toledo somehow.**

OCE: Toledo? What's in Toledo?

workitgood08: Same shit as a lot of cities, morons and moaning 🤔

OCE: Hahaha I have to find a reason to go there

workitgood08: Well, more pleasant moaning with us there, but still 🤔

Ya didn't answer the other question though btw

OCE: What question

**workitgood08: About if we intend to use any condoms in your pussy for now beyond
taking your virginity.....or if we plan to take the full risk now. Versus waiting a few
years to start going bare skin in that hole since I wouldn't be pulling out.**

OCE: It's up to u

**workitgood08: I mean.....we can get like one of the morning after pills of course.
But just so we are on the same page.....those do have a chance to not work. Low
chance, but possible.**

**OCE: What would we do if u got me pregnant
I just want to have fun to start**

**workitgood08: Well, your parents could destroy my life and call the cops if they
reacted and found out I got you pregnant at this age.**

16. Through review of the chat's your affiant is aware that "Layla" is a fictitious 14-year-old "friend" of the OCE. During several of the chats, WILCOXON expresses his desire to also have sex with "Layla" as well.

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17. WILCOXON and OCE, engage in several further discussions regarding sexual acts. WILCOXON repeatedly tells OCE all the sexual acts he would like to do to her, including taking her virginity. He even discusses purchasing the “morning after pill” for the OCE so they can have unprotected sex.

-05/02/2022 at 9:53:51 p.m. (UTC-6) and following:

workitgood08: Hun, I asked if you had thought about preference. If you're too nervous about me cumming inside you or worried, I can use them with you for now.

If you're not worried or if you want to feel me cum inside you, then I need to know that. But I would like to know your thoughts.

Same for Layla too.

OCE: I just don't know my preference yet. Ull have to be the lead on pretty much evyerthing.

workitgood08: Fair enough. If I cum inside you at all though.....we'll have to get you one of the morning after pills to take. Do you know if Layla is on any birth control? I don't remember if I asked about her already for that.

- 05/05/2022 at 1:56:08 p.m. (UTC-6) and following:

workitgood08: “Haha because you can enjoy the feeling of being stretched by my cock?”

OCE: “I’m definitely interested in that”....”I hope I like it”

workitgood08: “Hmm...what if it feels awkward? Gonna back off from sex a bit then.....or beg me to do it harder?” ... ”I mean it would be new for you and I’ll literally be inside your body” ... “I’m definitely looking forward to us actually getting to fuck hun. Wish we could run and not have to wait, but we’ll just have to soon as we can. Hopefully Layla can join you and you both can enjoy the cock”

- 06/10/2022 at 8:08:26 a.m. (UTC-6) and following:

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workitgood08: “oh....random byw. If youre naked and I tell you to sit on my face.....do you have an idea what I mean to do? Im curious if you know at all”

OCE: “lol no I don’t. Like literally sit on u”

workitgood08: Yep for like likcing your pussy or your ass kinda stuff. The stuff that would be called eating you out”

OCE: Oh well how do you breathe???

Workitgood08:” Haha I screeshotted a couple things from a vid or 2 that might help lol”

*Workitgood08 then sent six photos of sexually explicit conduct to the OCE. Although ages of the females are unknown, one of the images contained a naked female who you’re your affiant opines could be a teenager.

Workitgood08: “So basically like this, but me laying with my head under your butt. You can just enjoy it thatway or suck my cock while I’m licking your pussy or ass that way hun”

18. Your affiant reviewed several chats between OCE and Workitgood08 during which Workitgood08 tried to get OCE to send him naked photos of herself. Below is a sample of the chats:

- 5/3/2022 10:09:51 PM(UTC-6)

Workitgood08: So tell me hun.....are we going to have any issue with you sending me anything of you girls naked anymore either? Or gonna do that for me?

- 06/10/2022 at 5:08:47 p.m. (UTC-6) and following:

Workitgood08: “Ya know.....that would be a great time to video call me so I can watch you all naked and wet in the shower Hun”

-06/10/2022 at 7:14:26 p.m. (UTC-6)

OCE: We can try to make it happen”

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Workitgood08: “Sure hope so. Even if it's just a short one. At least shower time is a time you could strip down for me too”

Workitgood08: “That is something you want to do, right hun?”

19. On June 10, 2022, Charter Communications sent FBI El Paso results for a subpoena regarding the IP address associated with the Kik account. According to Charter Communications, the Subscriber name is Martin Wilcoxon with a service address of 342 East Street, Defiance, Ohio 43512-2272.

20. Your affiant has been advised that consistent with the Charter subpoena results, on April 8, 2022, around 10pm El Paso time (4am April 9, 2022, UTC) WILCOXON chatted with the OCE, specifically during one of the chats, he told the OCE that he wanted to impregnate her. The OCE conveyed that according to the subpoena return from Charter Communications that at the time of this chat, WILCOXON was utilizing home Wi-Fi associated with the residence at 324 East Street, Defiance, Ohio 43512 on April 9, 2022, at 3:47am, which was registered to his name.

21. Your affiant reviewed a local police report from March of 2021 wherein WILCOXON discussed his vehicle parked adjacent to 324 East Street, Defiance, Ohio. In this report, he informed the officer that he is renting this property for his primary residence.

22. Your affiant also reviewed a police report from the Defiance Ohio Police Department from December of 2021. According to the report, an 11-year-old female with the initials “B.S.” informed the Defiance Police that approximately during the summer of 2021 she stayed overnight at the residence of WILCOXON at 324 East Street, Defiance, Ohio. She advised that she lives near WILCOXON, and he allows her to play video games at his residence. On one evening, she recalls handing him the video game controller around midnight and falling

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asleep on his couch. At some point, “B.S.” awoke to the feeling of “air touching her buttocks” with WILCOXON sitting next to her on the couch. The child said she fell back asleep and told the police that she “didn’t know” if WILCOXON touched her. However, prior to this interview, a nine (9) year old female friend of B.S. told her mother, who reported it to the mother of “B.S.”, who reported it to the police, that “B.S.” told her, that when “B.S.” felt the air touch her buttocks, that she “felt a finger on her going down her pants and on her butt.”

23. On June 16, 2022, WILCOXON was arrested by FBI Cleveland during the execution of a federal search warrant at his residence at 324 East Street Defiance, Ohio 43512. WILCOXON was transported the Defiance County Sheriff’s Office, where he was advised of Miranda rights and agreed to talk to investigators. During the interview, WILCOXON made statements indicating that he had been in contact with a girl (the OCE) in Texas who stated that she was 13. WILCOXON was advised that his Kik account has been in contact with that of a 13-year-old girl from El Paso for several months now. WILCOXON stated: "(inaudible) So that was a legitimate thing on there... somebody actually real on that app for a change? That'd be nice...Uh, I'm not saying age-wise, but it would be nice to actually run into somebody that was actually real on there."

24. Later while being interviewed by an FBI polygrapher, WILCOXON made statements indicating he had massaged the buttocks area and “incidentally may have” touched the vaginal area of “B.S.”, the 11-year-old female neighbor. WILCOXON further advised among other admissions, that he had pressed his erect penis against “B.S.” through his clothing, walked out of the shower naked with an erect penis in front of “B.S.” in his home, and showed “B.S.” pornography to explain various sex acts to her.

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25. On June 17, 2022, your Affiant conducted a brief review of the contents of an external hard drive that was located in a locked safe, which was seized from WILCOXON's residence on the previous day. That external hard drive contained a large amount of child pornography content. Since that time through present, your affiant has been reviewing images and videos from a cellphone seized from the bed-side table in WILCOXON's bedroom. Analysis of the contents of that cellphone are ongoing; however, your affiant opines there are well over 1,000 images containing child pornography, as well as numerous videos containing Child Sex Abuse Material (CSAM).

26. On 06/23/2022, a preservation request was sent to "Kik c/o MediaLab.AI Inc." for any/all accounts for WILCOXON.

27. As mentioned previously, Kik Messenger "Kik c/o MediaLab.AI Inc.", is an online chat platform that enables users to chat directly or in groups using text or chatbots. The FBI has reason to believe that the Kik Messenger chats mentioned above are not the only Kik correspondence that WILCOXON has had with presumed minor females. One purpose for this request is to identify other potential on-line minor victims of WILCOXON, while he was using their platform to victimize minors.

28. In general, providers like "Kik c/o MediaLab.AI Inc." ask each of their subscribers to provide certain personal identifying information when registering for an ACCOUNT. This information can include the subscriber's full name, physical address, telephone numbers and other identifiers, e-mail addresses, and, for paying subscribers, a means and source of payment (including any credit or bank account number).

29. Providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the

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account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service utilized, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account. In addition, providers often have records of the Internet Protocol address (“IP address”) used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices were used to access the ACCOUNT.

30. In some cases, ACCOUNT users will communicate directly with a provider about issues relating to their account, such as technical problems, billing inquiries, or complaints from other users. Providers typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well records of any actions taken by the provider or user as a result of the communications.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

31. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require “Kik c/o MediaLab.AI Inc.” to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

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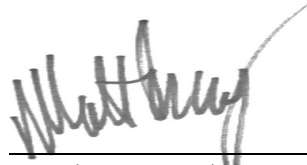
CONCLUSION

32. Based on the forgoing, I request that the Court issue the proposed search warrant.

33. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

34. The government will execute this warrant by serving the warrant on “Kik c/o MediaLab.AI Inc.”. Because the warrant will be served on “Kik c/o MediaLab.AI Inc.”, who will then compile the requested records at a time convenient to it, reasonable cause exists to permit the execution of the requested warrant at any time in the day or night.

Respectfully submitted,



Matthew Cromly
Special Agent, FBI Cleveland

Sworn to via telephone after submission by
reliable electronic means. Crim.Rules. 4.1;
41(d)(3) this 29th day of July 2022



DARRELL A. CLAY
UNITED STATES MAGISTRATE JUDGE